

**REMARKS**

This Amendment is prepared in response to the final Office action mailed on 11 January 2006 (Paper No. 010506). Upon entry of this amendment, claims 1, 4, 5, 7 through 12 and 14 through 22, 24 and 25 will be pending. Applicant has amended claims 1, 4, 12 and 15, canceled claims 3, 13 and 23 without prejudice or disclaimer as to their subject matter and newly added claim 25 by this amendment.

In Paper No. 010506, the Examiner objected to claim 23 for failing to further limit base claim 12. Applicant has canceled claim 23 by this amendment making this claim objection moot.

**I. Applicant's Amendments**

On Page 7 of Paper No. 010506, the Examiner deemed that claim 13 would be allowable if rewritten in independent form. Applicant has amended independent claim 12 by this amendment to include the subject matter of allowable claim 13 to place claim 12 and its depending claims in instant condition for allowance.

On Page 7 of Paper No. 010506, the Examiner deemed that claim 15 would be allowable if rewritten in independent form. Applicant has amended independent claim 15 by this amendment to include the subject matter of base claim 12 to place claim 15 in independent form so that claim 15 and its depending claim are now in instant condition for

allowance.

On Page 6 of Paper No. 070905 (the First Office action), the Examiner deemed that claim 3 would be allowable if rewritten in independent form. Applicant has amended claim 1 by this amendment to include the subject matter of claim 3 to place claim 1 and its depending claims in instant condition for allowance.

In this amendment, Applicant has further amended claim 1 by eliminating the language of former claim 2. As a result, Applicant submits that claim 1 as so amended is deserving of instant allowance as per Page 6 of the first Office action (Paper No. 070905).

Applicant has further newly added claim 25 by this amendment to reinstate the subject matter of former claim 2. Applicant submits that this claim should be entered after final and allowed because 1) it depends from an allowed claim and 2) it was previously examined.

## **II. Response to Examiner's Response to Applicant's Arguments**

On Pages 8 and 9 of Paper No. 010506, the Examiner responded to Applicant's four arguments of October 13, 2005 as i, ii, iii and iv in the Response to Arguments section of Paper No. 010506. Applicant will now respond to Examiner's responses iii and iv:

**Regarding paragraph (iii)** on Page 9 of Paper No. 010506, the Examiner states the

claim limitation that the address electrodes are of a circular cross section in Applicant's claims 7 and 18 is an obvious design choice. Applicant disagrees for the following reasons.

In the October 13, 2005 amendment, Applicant argued that circular cross-sectioned address electrodes in a display panel are not an obvious design choice because they can not be made using ordinary electrode forming techniques for display panels. The ordinary techniques for forming electrodes in a plasma display are thin film deposition techniques. Applicant stated that these thin film deposition techniques could not be used to produce circular cross-sectioned electrodes. Applicant also noted that the applied prior art references of Asano and Kato also used deposition techniques and did not use Applicant's technique of attaching a pre-formed wire to the display panel. Applicant reasoned that because all of the applied prior art references taught deposition and did not teach wire attachment to form the electrodes of a plasma display panel, and that a circular cross-sectioned electrode can not be made using the deposition technique, that a circular cross-sectioned address electrode in a plasma display panel is not an obvious design choice as alleged by the Examiner. Applicant again stands by his earlier position in this regard that a circular cross section for an electrode in a plasma display panel is not an obvious design choice.

In paragraph (iii) of Paper No. 010506, the Examiner responded by saying "The references cited clearly show that it is known to use electrodes having circular cross-section." Applicant disagrees. Neither of the applied prior art references of Asano and Kato

teach circular cross-sectioned electrodes in a display. If the Examiner is relying on some other reference to make this point, it needs to be applied. Since no other references have been or are being applied in the prosecution history, Applicant need not consider some other unknown and unapplied reference of the Examiner. If the Examiner intends to bring in another reference showing a circular cross-sectioned electrode in a plasma display panel, the correct procedure would be for the Examiner to reopen prosecution, apply the some other reference and justify the motivation to combine in a non-final Office action. Therefore Applicant refuses to entertain the unapplied references of Kao (USP 6,495,967), Kunii (USP 6,608,441) and Moore (USP 6,459,200) listed but not applied on page 6 of Paper No. 010506.

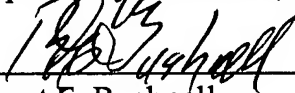
**In paragraph (iv)** on page 9 of Paper No. 010506, the Examiner responded to Applicant's arguments that the discharge cells are "staggered" on opposite side of a first barrier rib. In paragraph (iv), the Examiner said that an ordinary lattice shaped array of discharge cells of Asano or Kato would read on Applicant's claimed staggering because an (i,j) discharge cell is staggered from an (i+1, j+1) etc and thus the lattice shaped discharge cell array is also staggered. Applicant disagrees. Applicant submits that a lattice shaped discharge cell array can not be considered to be staggered. Applicant submits that staggered means that one row of discharge cells is shifted by *a fraction* of a discharge cell pitch from another row and does not imply that one row of discharge cells can be shifted by a whole number of pitches over.

Because Applicant has amended each of Applicant's claims to place them in instant condition for allowance as per Paper Nos. 070905 and 010506, Applicant hereby expects a Notice of Allowance in response to the filing of this amendment.

In view of the above, it is submitted that all of the claims now present in the application are patentable over the cited references, taken either alone or combination and accordingly should now be in a conditions suitable for allowance. No other issues remaining, reconsideration and favorable action upon all of the claims now present in the application is respectfully requested.

No fee is incurred by this amendment.

Respectfully submitted,

  
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